

MARK B. HANSON, ESQ.
Second Floor, Macaranas Building
Beach Road, Garapan
PMB 738 P.O. Box 10,000
Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
Facsimile: (670) 233-5262
E-mail: mark@saipanlaw.com

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,)

vs.)

EX PARTE MOTION UNDER LOCAL
RULES 7.1.h.3(b) AND 7.1.h.5 FOR A
PAGE EXTENSION

JUNG JIN CORPORATION, a CNMI corporation,)
ASIA ENTERPRISES, INC., a CNMI corporation,)
PARK HWA SUN and KIM HANG KWON,)

Defendants.)

Date: Wednesday, January 17, 2007
Time: 9:00 a.m.
Judge: Hon. Alex R. Munson, Chief Judge

Plaintiffs, by and through their undersigned attorney of record, hereby file, this Motion, *ex parte*, pursuant to Fed R. Civ. P. 6(d) and Local Rules 7.1.d and 7.1.h.3(b) to request a page extension on a Memorandum of Facts and Law submitted in connection with briefing ordered in proceedings in aid of judgment.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.H.3(b)

1. I am the attorney for Plaintiffs in the above-captioned case. I submit this certificate pursuant to Local Rules 7.1.h.3(b) in support of Plaintiffs' *ex parte* motion for an order allowing a page extension for a Memorandum of Facts and Law submitted in connection with Plaintiffs' Application for an Order in Aid of Judgment. In support of this motion, Plaintiffs submit this

1 Certificate of the undersigned.

2 2. On December 22, 2006, based on the motion of third-party Pil Sun Kim Kitami, the Court
3 ordered briefing on the issues involved in the show cause proceedings against Ms. Kitami related to
4 Plaintiffs' continuing efforts to collect their judgment in this case.

5 3. On January 10, 2007, pursuant to the Court's briefing schedule, Ms. Kitami filed her
6 Response to Order to Show Cause.

7 4. In response thereto, and in further support for the relief requested by Plaintiffs against Ms.
8 Kitami, Plaintiffs' counsel has prepared a lengthy Memorandum of Facts and Law Plaintiffs wish to
9 file with the Court. Today, January 15, 2007, is the due date for Plaintiffs' filing.

10 5. The Memorandum that Plaintiffs want to file is 34 pages not including the signature page
11 and the certificate of service, exceeding by 9 pages the maximum number of pages a brief may be
12 without leave of court.

13 6. Under the circumstances of this case, Plaintiffs have included an extensive recitation of
14 facts with appropriate references to the record. The facts section of Plaintiffs' Memorandum, alone,
15 is comprised of 13 pages.

16 7. Further, the issues raised in the proceeding warranted a detailed review of the common
17 law applicable to the facts of the matter and a detailed application of the detailed facts to that law.

18 8. Plaintiffs believe that the facts and circumstances involved in the briefing warrant the
19 extension of the page limits to 34 pages (excluding the signature page and certificate of service, and
20 any subsequent addendums containing a table of contents and table of authorities).

21 9. A hearing on the issues involved in the briefing has been scheduled for Wednesday,
22 January 17, 2007 at 9:00 a.m.

23 10. Defendants are proceeding *pro se* since the withdrawal of their attorney prior to the
24 judgment in this matter. Their last know contact information is as follows:

25 Jung Jin Corporation
26 P.O. Box 503428

Park Hwa Sun
P.O. Box 503428

Saipan, MP 96950
(670) 235-4321

Saipan, MP 96950
(670) 235-4321

Asia Enterprises Inc.
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

11. The above-listed defendants will receive a copy of this motion, counsel's declaration, and the Memorandum of Facts and Law by certified mail.

12. Richard W. Pierce, the attorney for third-party Pil Sun Kim Kitami, will be notified by the Court's Electronic Case Filing system upon the filing of this Motion. The undersigned has already provided Mr. Pierce with a draft of the Memorandum and he should have been served already with the Declaration of counsel including the exhibits attached thereto.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant their motion to extend the allowable number of pages for Plaintiffs' Memorandum of Facts and Law to 34 pages (excluding the signature page and certificate of service, and any subsequent addendums containing a table of contents and table of authorities). A proposed order has been submitted herewith for the Court's convenience.

Respectfully submitted this 15th day of January, 2007.

/s/ Mark B. Hanson

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E-mail: mark@saipanlaw.com

Attorney for Plaintiffs